

## Privacy Policy - highstreet.io

[Last update: 18.07.2022]

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**What is this document?** Pursuant to art. 13 European Reg. n. 679/2016 (“**General Data Protection Regulation**” or “**GDPR**”) and in compliance with the principles contained therein, Kipcast S.r.l. intends to inform each user (the “**User**”) about the processing of personal data happening on its website [www.highstreet.io](http://www.highstreet.io).

### Contact details of the Data Controller and Joint-Controllers

**Kipcast S.r.l.** with registered offices in Via Spagnole 2/B, 37015 Domegliara, Italy.  
email address: [info@kipcast.com](mailto:info@kipcast.com)

The companies (“**Companies**”) of the Impresoft Group (“**Group**”), indicated hereinafter, act as joint data controllers in the processing of personal data for commercial and marketing purposes in order to manage their client portfolio as specified under letters D. and E. below, having determined jointly the purposes, methods and means of processing through a specific agreement under article 26 of the GDPR.

**Formula Impresoft S.p.A.**, whose legal and administrative Headquarters is located at Via Bisceglie 76, Milano; Fiscal and Tax code is 05488960013; it is legally represented by Giuseppe Rossano Ziveri; email is [gdpr@formulaimpresoft.com](mailto:gdpr@formulaimpresoft.com)

**Qualitas Informatica S.p.A.**, whose legal Headquarters is located at Via Marco Dalla Vecchia, 12, Santorso (VI); Fiscal and Tax code. 01833260241; it is legally represented by Sergio Gasparin; email is [ufficiomarketing@qualitas.it](mailto:ufficiomarketing@qualitas.it)

**4ward S.r.l.**, whose legal Headquarters is located at Via del Vigneto 33, Bolzano; Fiscal and Tax code. 03408060964; it is legally represented by Christian Carlo Alberto Parmigiani; email is [privacy@4wardpro.it](mailto:privacy@4wardpro.it)

**NextTech S.r.l.**, whose legal Headquarters is located at Piazza San Nicolò,15 30034 Mira (VE); Fiscal and Tax code 05488960013; it is legally represented by Mauro Dal Corso; email is [info@nexttech.it](mailto:info@nexttech.it)

**OpenSymbol S.r.l.**, whose legal Headquarters is located at Via Vecchia Ferriera, 5 Vicenza (VI); Fiscal and Tax code 03184500241; it is legally represented by Enrico Maggi; email is [info@opensymbol.it](mailto:info@opensymbol.it)

**Next CRM S.r.l.**, whose legal Headquarters is located at Via Rossini, 6, Vicenza (VI); Fiscal and Tax code 04119450247; it is legally represented by Luigi Mattiazzi ; email is [direzione@pec.nextcrm.it](mailto:direzione@pec.nextcrm.it)

**Cloud Nova S.r.l.**, whose Legal Headquarters is located at Via Riva del Grappa 18, Cittadella (PD); Fiscal and Tax Code is 04673080281; it is legally represented by Alessandro Bodo; Company's email is [info@cloudnova.it](mailto:info@cloudnova.it)

Hereinafter separately referred to as Controller and together as joint Controllers.

The Joint Controllers, so as to facilitate relations between the interested party and each data Controller, have identified a common group email, as well as those for each company [privacy@impresoftgroup.com](mailto:privacy@impresoftgroup.com)

### **Purpose of processing, Legal Basis, Personal Data and Retention Period**

Controller and Joint Controllers processes personal data for the following purposes, as specified herein below. The table also shows the legal basis which justifies the processing and the period of data retention:

| Purpose  | Personal data   | Legal basis   | Data retention  |
|--|---|---|---|
| A. Contact   | <ul style="list-style-type: none"> <li>✓ Anagraphic information</li> <li>✓ Contact details</li> </ul> | Performance of a contract [Art. 6, 1, lett. b) GDPR]  | For the period necessary for the response.  |
| B. Communication for marketing purposes.   | <ul style="list-style-type: none"> <li>✓ Anagraphic information</li> <li>✓ Contact details</li> </ul> | Consent [Art. 6, 1, lett. a) GDPR]  | Until the withdrawal of the consent and not more than 24 months from the date of last contact.                    |
| C. Marketing purposes for the promotion and sale of products and services similar to those already purchased by the User (so-called <i>soft spam</i> ), through commercial communication, also of specific interest of the User. | <ul style="list-style-type: none"> <li>✓ Anagraphic information</li> <li>✓ Contact details</li> </ul> | Legitimate Interest consisting in offering the user services of probable interest [Art. 6, 1 lett. (f) GDPR] [Art. 130 c. 4 D. Lgs. 196/2003] | For the time strictly necessary for the achievement of the legitimate interest and until the eventual opposition. |

|  |  |   |   |
|--|--|---|---|
| <p>D. Sending promotional material (newsletters, promotion of workshops, webinars, events, promotion of products and services) and automatically regulated commercial communication (such as emails, sms and instant messaging) and traditional forms (such as calls from an operator)</p> | <p>✓ Anagraphic information<br/>✓ Contact details</p>                                | <p>Consent [Art. 6, 1, lett. a) GDPR]</p>             | <p>Until the withdrawal of the consent and not more than 24 months from the date of last contact.</p> |
| <p>E. Quality service, also through automatically regulated techniques (such as email, SMS, instant messaging) and traditional forms (such as calls from an operator).</p>   | <p>✓ Anagraphic information<br/>✓ Contact details</p>                                | <p>Consent [Art. 6, 1, lett. a) GDPR]</p>             | <p>Until the withdrawal of the consent and not more than 24 months from the date of last contact.</p> |
| <p>F. Allow the Controller to accomplish all formalities required by law.</p>  | <p>✓ Anagraphic information<br/>✓ Contact details</p>                                | <p>Legal obligation [Art. 6, 1, lett. c) GDPR]</p>    | <p>Until the expiry of the data retention period, as provided by the applicable law.</p>              |
| <p>G. Improve the Website by analyzing how Users navigate and/or use the Website.</p>  | <p>✓ Website usage data</p>  | <p>Legitimate interest [Art. 6, 1, lett. f) GDPR]</p> | <p>Not applicable (aggregate or anonymous data)</p>   |
| <p>H. Detecting or preventing fraudulent activity and exercising the Controller's rights in Court</p>  | <p>✓ Anagraphic information<br/>✓ Contact details<br/>✓ Professional information</p> | <p>Legitimate interest [Art. 6, 1, lett. f) GDPR]</p> | <p>10 years</p>   |

Disclosure of data for marketing purposes is non-compulsory and the related processing will be subject to the legitimizing assumption of consent. The lack of consent to the processing will not allow the indicated promotional activity, but will not affect the interested party in any way.

For commercial and marketing purposes under letters D. and E., the joint Controllers have furthermore jointly determined within the specific agreement, the processing methods and have defined, clearly and transparently, the procedures to supply to the interested party a prompt response in case they wish to exercise their rights, as determined under articles 15, 16, 17, 18 and 21 on the regulation as well as in cases of transferability of personal data under article 20 of the regulations.

Users can ask for an explanation of the legal basis of each treatment at any time.

### **Processing modalities**

The processing of Personal Data will take place through automated and/or manual tools in order to ensure proper security measures to prevent access, disclosure, loss, incorrect, illegal or unauthorized use of data.

### **Data Sharing**

The User's personal data will be processed by the Controller's internal staff specifically authorized pursuant to Article 29 of the GDPR.

Personal data may also be shared with the following external parties:

- i. commercial, marketing, legal, technical service provider and/or software platform provider partners and/or System administrators, hosting providers, ICT companies and communication agencies;
- ii. third-party service providers who perform services for us or on our behalf and require access to such information to do that job;
- iii. subjects who perform banking services, including subjects involved in payment management systems;
- iv. people, companies, associations or professional firms who offer services or assistance for consulting activities to the Controllers with particular, but not exclusive reference to accounting, administration, legal matters, taxes and finance and commercial activities;
- v. subject who perform activities under control, revision and certification obligations of the activities performed by the companies of the Group also in the interest of the clients.

All of the relations with the subjects listed above are - and will be - formalized with a contract pursuant to Art. 28 GDPR (Data Protection Agreement or "DPA").

The updated list of any subjects to whom the personal data of the User may be disclosed and or transferred, is available by contacting us at the above addresses.

With specific consent, the Controllers may disclose the personal data to third-party companies (not part of the Group) who will process it as independent Controllers, for purposes of commercial information, statistical research, market research, direct offers of their products and services.

### **Data processing locations**

Personal data are processed at the headquarters of the Controller, as well as in the servers that host the Website. The Controller ensures that when using cloud providers established outside the EEA, the processing of personal data by these recipients is carried out in accordance with applicable law. Transfers shall be carried out by means of appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards provided for in the GDPR.

### **Data Subjects' rights**

The User may exercise all the rights provided for by Articles 15-21 of GDPR, at any time and without unjustified limitations. Requests shall be filed free of charge and processed by the Controller within 30 days.

Specifically, the User can:

- Obtain from the controller confirmation as to whether or not personal data are being processed (Art.15);
- Obtain from the controller the rectification of inaccurate personal data (Art. 16);
- Obtain from the controller the erasure of personal data (Art. 17);
- Obtain from the controller restriction of processing (Art. 18);
- Have the right to receive the personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (Art. 20);
- Have the right to object (Art. 21).

We hereby inform the User that, under art.12 of the GDPR, if the requests of the User are evidently unfounded or excessive, in particular for their repetitive nature, the Controllers may: a) charge reasonable expense costs, keeping in mind the administrative costs sustained to supply the information or the communication or to perform the action requested or b) refused to comply with the request.

The rights above may be exercised both with the single Controllers and jointly with the Joint Controllers sending written communication to the following email address is:

**Kipcast:** [info@kipcast.com](mailto:info@kipcast.com)

**Impresoft Group:** [privacy@impresoftgroup.com](mailto:privacy@impresoftgroup.com)

**Formula Impresoft S.p.A.:** [gdpr@formulaimpresoft.com](mailto:gdpr@formulaimpresoft.com)

**Qualitas Informatica S.p.A.:** [ufficiomarketing@qualitas.it](mailto:ufficiomarketing@qualitas.it)

**4ward S.r.l.:** [privacy@4wardpro.it](mailto:privacy@4wardpro.it)

**NextTech S.r.l.:** [privacy@nexttech.it](mailto:privacy@nexttech.it)

**OpenSymbol S.r.l.:** [privacy@opensymbol.it](mailto:privacy@opensymbol.it)

**Next CRM S.r.l.:** [direzione@pec.nextcrm.it](mailto:direzione@pec.nextcrm.it)

**Cloud Nova S.r.l.:** [info@cloudnova.it](mailto:info@cloudnova.it)

### **Complaints**

In any case, Users are always entitled to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), under Art. 77 of the Regulation, if they believe that the Data Controller's processing of their Personal Data is in violation of the applicable law.

### **Amendments**

The Controller reserves the right to amend and update the Privacy Policy as a result of any further new or revised provisions of any national and EU laws and regulations on personal data protection.

